



ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via Overnight Delivery and Electronic Comment Filing Submission (ECFS)

November 1, 2017

Ms. Marlene H. Dortch,
Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: ASL Services Holdings, LLC Annual Compliance Report, Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Secretary Dortch:

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC dba GlobalVRS ("Global VRS") submits the attached *Annual Compliance Report* ("Report") and annual Customer Proprietary Network Information ("CPNI") compliance certification to the Commission. By this submission, GlobalVRS demonstrates and certifies its continued compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Telecommunications Relay Service Fund ("Fund") eligible Internet-based video relay services ("VRS") as set forth in Section 64.604 *et seq.* of the Commission's rules, 47 C.F.R. §§64.604 *et seq.* and CPNI regulations pursuant to Section 64.5101 *et seq.* of the Commission's rules, 47 C.F.R. §§64.5101 *et seq.*

As addressed in its *Report*, GlobalVRS remains in compliance with the MMS. In 2017, the Company undertook a significant initiative to update technical capabilities – including compliance with the upcoming Session Initiation Protocol profile regulations later this year, while introducing several enhancements to improve subscribers' experience. Further, GlobalVRS expanded its Deaf-Blind service capabilities with the benefit of its work within the Deaf-Blind Community and added experience in serving Deaf-Blind subscribers. And GlobalVRS is prepared to initiate at-home interpreting trials, which it believes will be important in demonstrating the value and flexibility of responsible, at-home interpretation.

Despite the impact of Hurricanes Irma and Maria, which decimated parts of Florida and Puerto Rico, the Company remained fully operational without service interruptions, while providing relief efforts to its Florida and Puerto Rico employees and their families.

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GlobalVRS remains active in Deaf Community outreach through ongoing creation of English and Spanish language videos and participation in national Deaf events, several of which it has sponsored, among other initiatives.

GlobalVRS remains the only VRS provider designated as having conditional Fund eligibility. The Company looks forward to working with the Commission to be granted final Fund eligibility.

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,¹ and "Exemption 4" of the Freedom of Information Act,² GlobalVRS respectfully requests that identified sections of its *Report* be deemed confidential and protected, accordingly.

The redacted sections of GlobalVRS' *Report* constitute "trade secrets" as set forth in Section 0.457 of the Commission's rules,³ in that the information reveals specific strategic and technical actions taken by the Company that would be useful to competitors. Further, redacted sections of the Company's *Report* contain highly confidential information not intended for public consumption. GlobalVRS would not otherwise make this information publically available under any circumstance. Release of this information the public could cause GlobalVRS irreparable and inestimable harm. GlobalVRS requests that the redacted sections be withheld from public inspection, accordingly. Should disclosure of the redacted sections be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, GlobalVRS states as follows:

1. Identification of the specific information for which confidential treatment is sought.

GlobalVRS requests confidential treatment to the confidential data appearing at pages 1, 2, 4, 5 and 6 of its *Report*.

2. Identification of the circumstances giving rise to the submission.

GlobalVRS is providing confidential information to demonstrate its mandatory minimum standard compliance pursuant to 47 C.F.R. §64.606(g).

¹ 47 C.F.R. §0.459.

² 47 C.F.R. §0.457(d). *See National Parks and Conservation Assn. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, 14 FCC Rcd. 1851,1860 (1998).

³ 47 C.F.R. §0.457.

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3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.

The confidential information constitutes highly confidential technical and operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

4. Explanation of the degree to which the information concerns a service that is subject to competition

The confidential information involves video relay services, a highly competitive service.

5. Explanation of how disclosure of the information could result in competitive harm.

Disclosure of confidential information could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's relative size; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete.

6. Identification of any measures taken to prevent unauthorized disclosure.

GlobalVRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.

GlobalVRS does not make the redacted information to the public or to third parties. Confidential information has been provided to the Commission.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

This information is being submitted by GlobalVRS. GlobalVRS requests that the redacted information be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to Global VRS.

In accordance with the Commission's May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

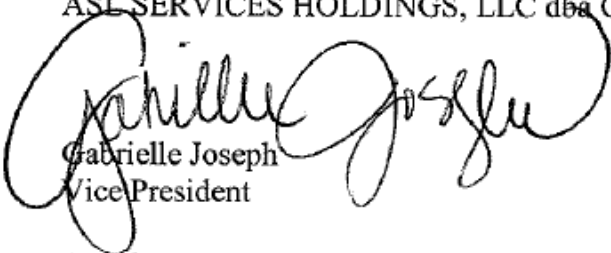
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Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC dba GLOBALVRS



Gabrielle Joseph
Vice President

Attachments

cc: TRSreports@fcc.gov
Ms. Karen Peltz Strauss (via electronic delivery)
Mr. Eliot Greenwald (via electronic delivery)

ASL Services Holdings, LLC dba GlobalVRS 2017 Annual Compliance Report

I. INTRODUCTION

Pursuant to Section 64.606(g) of the Commission’s rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC dba GlobalVRS (“GlobalVRS”) submits its initial *Annual Compliance Report* (“Report”)⁴ to the Commission. This Report demonstrates GlobalVRS’ continued compliance with the Commission’s Mandatory Minimum Standards (“MMS”) for the provision of Internet-based video relay services (“VRS”).

By its Report, GlobalVRS demonstrates that the Company meets and/or exceeds the MMS for the provision of Telecommunications Relay Service Fund (“Fund”) eligible VRS. In the past year, ASL has applied its unique trilingual, skill set⁵ to interpret nearly [REDACTED] calls representing more than [REDACTED] conversation minutes. GlobalVRS has experienced a [REDACTED] in call volume for the first time since it began providing VRS.

Per Section 64.606(g)(1), the following verified Report updates compliance information, where applicable. Otherwise GlobalVRS certifies that there are no changes to the information and documentation submitted with its Application for certification.⁶ A certification of the truthfulness, accuracy, and completeness of this Report by its Vice President, a GlobalVRS officer and minority owner, is attached pursuant to Section 64.606(g)(2).

⁴ *Notice of Conditional Grant of Application of ASL Services Holdings, LLC for Certification as a Provider of Video Relay Service Eligible for Compensation from Interstate Telecommunications Relay Service Fund*, CG Docket No. 10-51, *Public Notice*, DA 11-1902 (November 15, 2011).

⁵ American Sign Language, Spanish, and English.

⁶ *See, e.g. In the Matter of Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, *Application Of ASL Services Holdings, LLC* (September 6, 2011)(*Supp.* November 9, 2011)[“Application”].

II. SECTION 64.606(a)(2) UPDATE

GlobalVRS provides the following updates to the information contained in the Company's pending Application pursuant to Section 64.606(a)(2) of the Commission's rules, 47 C.F.R. §64.606(a)(2):

(i) A description of the forms of Internet-based TRS to be provided (i.e., VRS, IP Relay, and/or IP captioned telephone relay service);

There is no change in GlobalVRS's provision of VRS services as a conditional Fund eligible provider. Application page 8.

(ii) A detailed description of how the applicant will meet all non-waived mandatory minimum standards applicable to each form of TRS offered, including documentary and other evidence, and in the case of VRS, such documentary and other evidence shall demonstrate that the applicant leases, licenses or has acquired its own facilities and operates such facilities associated with TRS call centers and employs communications assistants, on a full or part-time basis, to staff such call centers at the date of the application. Such evidence shall include, but not be limited to:

(A) In the case of VRS applicants or providers,

(1) Operating five or fewer call centers within the United States, a copy of each deed or lease for each call center operated by the applicant within the United States;

[REDACTED]; Application page 9, Exhibit A.

(2) Operating more than five call centers within the United States, a copy of each deed or lease for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States, together with a list of all other call centers that they operate that includes the information required under §64.604(c)(5)(iii)(N)(2);

Inapplicable [REDACTED]. Application page 9.

(3) Operating call centers outside of the United States, a copy of each deed or lease for each call center operated by the applicant outside of the United States;

Inapplicable. GlobalVRS does not operate call centers outside of the U.S.; Application page 9.

II. SECTION 64.606(a)(2) UPDATE, Continued

(4) A description of the technology and equipment used to support their call center functions-including, but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS Fund, and registration-and for each core function of each call center for which the applicant must provide a copy of technology and equipment proofs of purchase, leases or license agreements in accordance with paragraphs (a)(2)(ii)(A)(5) through (7) of this section, a statement whether such technology and equipment is owned, leased or licensed (and from whom if leased or licensed);

Although the Company's existing call center technology and equipment remains unchanged, GlobalVRS is implementing platform enhancements in anticipation of compliance with SIP profile and current X Card requirements. These enhancements will enable GlobalVRS to further expand user capabilities and control under the Company's personal computer, and mobile Android and IOS applications. Global VRS is also preparing for a move to new Amazon cloud servers in 2018. Details of this upgrade will be provided under a separate Notice of Substantive Change, upon completion Application page 10, Exhibit B.

(5) Operating five or fewer call centers within the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant within the United States;

Please refer to item (1), *supra*. The Commission retains copies of all leases and license agreements for all technology and equipment used to support GlobalVRS' call center functions for each call center it operates within the United States. Application page 10, Exhibit C.

(6) Operating more than five call centers within the United States, a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States; a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for all call centers operated by the applicant within the United States must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;

Inapplicable. See item (2), *supra*.

II. SECTION 64.606(a)(2) UPDATE, Continued

(7) Operating call centers outside of the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant outside of the United States; and

Inapplicable. *See* item (3), *supra*.

(8) A complete copy of each lease or license agreement for automatic call distribution.

No change; Application page 10, Exhibits B.

(B) For all applicants, a list of individuals or entities that hold at least a 10 percent equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant, a description of the applicant's organizational structure, and the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company);

No change; Application page 11.

(C) For all applicants, a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; video phone installers (in the case of VRS), communications assistants, and persons involved in marketing and sponsorship activities;

The Company currently employs a total of [REDACTED] individuals including [REDACTED] executive managers, [REDACTED] active interpreters and [REDACTED] administrative employees who are directly responsible for the provision of VRS.

(D) For all applicants, copies of employment agreements for all of the provider's employees directly involved in TRS operations, executives, and communications assistants, and a list of names of employees directly involved in TRS operations, need not be submitted with the application, but must be retained by the applicant for five years from the date of application, and submitted to the Commission upon request; and

No change; Application page 12. GlobalVRS will provide the Commission with a copy of all employment agreements immediately upon request.

(E) For all applicants, a list of all sponsorship arrangements relating to Internet-based TRS, including on that list a description of any associated written agreements; copies of all such arrangements and agreements must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;

No change. GlobalVRS has no current formal sponsorship arrangements; Application page 12.

II. SECTION 64.606(a)(2) UPDATE, Continued

(iii) A description of the provider's complaint procedures; and

No change: The Company's annual Consumer Complaint Log Submission was filed on June 26, 2017. Application pages 12 and 13.

(iv) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

Please see attached certification.

(v) The chief executive officer (CEO), chief financial officer (CFO), or other senior executive of an applicant for Internet-based TRS certification under this section with firsthand knowledge of the accuracy and completeness of the information provided, when submitting an application for certification under paragraph (a)(2) of this section, must certify as follows: I swear under penalty of perjury that I am (name and title), _an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

Please refer to attached certification.

(vi) Assessment of Internet-Based Provider Certification Application (47 C.F.R. §64.606(a)(3))

GlobalVRS has participated in Commission and Fund Administrator audits beginning in 2014. In 2017 GlobalVRS participated in a Rolka Loube audit led by McKonly & Asbury. [REDACTED]. GlobalVRS will continue to fully cooperate with any scheduled audits from the Commission. The Company's Application remains pending final Commission review.

(vii) Substantive Changes – Equipment, Facilities (47 C.F.R. §64.606(f)(2))

[REDACTED] .

(viii) Substantive Changes – Service Discontinuation (47 C.F.R. §64.606(f)(2))

No service interruptions have been reported in 2017. GlobalVRS has remained fully operational without service interruptions in 2017, including the Company's continued provision of uninterrupted service though Hurricanes Irma and Maria, which decimated parts of Florida and Puerto Rico.

III. GLOBALVRS COMPLIANCE WITH SECTION 64.604, MANDATORY MINIMUM STANDARDS.

The Company continues to meet MMS for the provision of VRS, and hereby provides the following compliance updates to its Application, which it incorporates herein by reference as otherwise unchanged.

A. Operational Standards.

1. Communications Assistant (“CA”) – Training (47 C.F.R. §64.604(a)(1)) and 64.606(g)(3)(ii).

No change. The Company has continued to engage in specialized Spanish language and DeafBlind interpreter training and is preparing for at-home interpreter pilot program training. Interpreters continue to be briefed as systems and operational enhancements are deployed.

2. Communications Assistant – Confidentiality and conversation content. (47 C.F.R. §64.604(a)(2))

No change. See discussion regarding CPNI compliance, *Infra*.

4. Handling of emergency calls. (47 C.F.R. §64.604(a)(4)) and amended Section 64.605.

No change. Application page 23. The Company processed five emergency calls in 2017.

B. Technical Standards

2. Speed of Answer. (47 C.F.R. §64.604(b)(2)(iii)).

GlobalVRS’ speed of answering is for the 12 month period ending October 31, 2017 is [REDACTED] percent of calls answered within 120 seconds or less, well above the established standard. At no time during this period did the Company’s percentage of calls answered within 120 seconds drop below [REDACTED] percent.

5. Technology. (47 C.F.R. §64.604(b)(5)).

No change. The Company continues to pursue enhancements to its wireless applications and call distribution platform to make them more user friendly and improve user accessibility, while meeting Commission TRS Program reform obligations. GlobalVRS is currently the only known provider with Braille display compatibility.

III. GLOBALVRS COMPLIANCE WITH SECTION 64.604, MANDATORY MINIMUM STANDARDS, Continued

8. Voluntary at-home VRS Call Handling Pilot Program. (47 C.F.R. §64.604(b)(8)).

On September 1, 2017, GlobalVRS informed the Commission of its intent to participate in the voluntary at-home VRS call Handling Pilot Program and submitted a proposed compliance plan.

C. Functional Standards

1. Consumer Complaint Logs (47 C.F.R. §§64.604(c)(1))

No change: The Company's annual Consumer Complaint Log Submission was filed on June 26, 2017.

2. Contact Persons. (47 C.F.R. §§64.604(c)(2)) and 64.606(g)(3)(i))

No change: The senior individual responsible to receive complaints, grievances, inquiries, and suggestions for GlobalVRS and officers responsible for compliance with section 64.604(c)(13) are as follows.

Representatives:

Gabrielle Joseph

ASL Services Holdings, LLC/GraciasVRS

3700 Commerce Blvd.

Kissimmee, Florida 34741

Phone: 888-472-6768 (Spanish VRS)

888-472-6778 (English VRS)

E-Mail: Gabrielle@aslservices.com

Website: www.GlobalVRS.com

Facsimile: 407.518.7903

Voice Telephone: 1.877.DAME.VRS (1.877.326-3877)

English and Spanish VP Users: Globalvrs.tv

3. Public Access to Information. (47 C.F.R. §64.604(c)(3)).

No change: GlobalVRS continues to expanded its outreach efforts in educating the public and stakeholders about trilingual (English, Spanish, American Sign Language) VRS Services. The Company has also supported Deaf-Blind community with added information and capabilities following its assumption of Deaf-Blind subscribers in early 2016.

III. GLOBALVRS COMPLIANCE WITH SECTION 64.604, MANDATORY MINIMUM STANDARDS, Continued

6. Data Collection and Audits from TRS Providers (47 C.F.R. §64.604(c)(5)(iii)(D))

No change: GlobalVRS has timely submitted all data to the TRS Fund Administrator and appointed auditors.

Whistleblower protections (47 C.F.R. 64.604(c)(5)(iii)(M))

GlobalVRS addresses Whistleblower protection requirements as part of its initial employee orientation and incorporated into more formalized training program.

D. Other Standards (47 C.F.R. 64.604(d))

The applicable requirements of sections 64.605, 64.611, 64.615, 64.617 (Neutral Video Communications Service Platform – Inapplicable to ASL), 64.621, 64.631, 64.632, 64.5105, 64.5107, 64.5108, 64.5109 and 64.5110 of this part are to be considered mandatory minimum standards.

Section 64.611 Internet-based TRS registration.

Section 64.615 TRS User Registration Database and administrator.

GlobalVRS has implemented additional enhancements to its registration process with the adoption of standalone forms and additional language to underscore certain information and make confirmations more visible to subscribers. Preparation is underway for the implementation of the TRS-URD. GlobalVRS has participated in the weekly/bi-weekly Rolka Loube meeting on URD Implementation with RL and will be ready once instructions are finalized and OMB has given approval for the URD to open.

Section 64.621. Interoperability and portability.

GlobalVRS implemented the “X Card” requirement and is prepared to implement the new SIP profile and requirements as well. GlobalVRS team continues to participate in the SIP Interoperability Conference every 6 months and is looking forward to the SIP implementation in December 2017.

Section 64.631 Verification of orders for change of default TRS providers.

Section 64.632 Letter of authorization form and content.

No change. GlobalVRS has made additional enhancements to its registration process to more clearly underscore important user information and confirm subscriptions through a Letter of Authorization now appearing as a separate document.

III. GLOBALVRS COMPLIANCE WITH SECTION 64.604, MANDATORY MINIMUM STANDARDS, Continued

CPNI Requirements for Relay Service Providers. Section 64.5101 *et seq.*

No change. GlobalVRS continues to stress CPNI compliance in its training program. Pursuant to Section 64.5109(e), attached hereto is GlobalVRS' CPNI compliance certification.

IV. COMPLIANCE WITH SECTION 64.606(g)(3)

1. Identification of any officer(s) or managerial employee(s) responsible for ensuring compliance with §64.604(c)(13) of this subpart; (47 C.F.R. §64.606(g)(3)(i))

Please refer to Section III.C.2. at page 7, *supra*.

2. A description of any compliance training provided to the provider's officers, employees, and contractors; (47 C.F.R. §64.606(g)(3)(ii))

GlobalVRS has engaged in ongoing compliance training with employees through employee manual enhancements and development of specific training materials, including CPNI compliance materials. The Company frequently addresses compliance issues with employees to deepen their understanding of specific regulatory requirements.

3. Identification of any telephone numbers, Web site addresses, or other mechanisms available to employees for reporting abuses; (47 C.F.R. §64.606(g)(3)(iii))

Please refer to Section III.C.2. at page 6, *supra*. In addition to contacting Company officers, an FCC Updates page is contained in the Company's web site, <http://globalvrs.com/globalvrs-fcc-updates/the-fcc-needs-you/>. This page contains hyperlinks to various Commission links in English and Spanish. Additionally, employees are advised that they may also contact the Commission directly:

Federal Communications Commission
Consumer and Government Affairs Bureau
Consumer Inquiries and Complaints Division
445 12th Street
Washington DC 2055
VOICE: 1-888-CALL-FCC
TTY: 1-888-TELL-FCC
www.fcc.gov/complaints

IV. COMPLIANCE WITH SECTION 64.606(g)(3)

4. **A description of any internal audit processes used to ensure the accuracy and completeness of minutes submitted to the TRS Fund administrator; (47 C.F.R. §64.606(g)(3)(iv))**

All usage reporting is automated through the Company's platform. There is no capability for manual access to reported data.

GlobalVRS' continues to use the reporting built in the existing platform that has been programmed to prepare a "Daily FCC Report." This report lists call detail record, speed of answer and verified conversation minutes from the previous day. These data populate the Daily Administration Report (DAR) which contains all the statistical data reported to the Fund Administrator. The "Daily FCC Report" is statistically sampled by the Company and cross-referenced to the interpreters' manual log sheets to ensure accuracy. Company and also review any reports/updates/events/feedback from our Administrative Team. A Monthly Verification Report (MVR) is created to audits the results of the DAR report analysis to verify the final monthly reports and ensure accuracy of the monthly Fund Administrator submissions.

5. **A description of all policies and practices that the provider is following to prevent waste, fraud, and abuse of the TRS Fund. A provider that fails to file a compliance plan shall not be entitled to compensation for the provision of VRS during the period of noncompliance. (47 C.F.R. §64.606(g)(3)(v))**

No change. GlobalVRS has implemented an extensive screening process to ensure service quality.

A Whistleblower Policy is incorporated into the Company's employee handbook. This policy encourages employees to immediately report any illegal activity directly to the Commission and advise senior management. Employees receive training on applicable Commission regulations.

GlobalVRS has maintained quarterly meetings where employees are briefed on Commission regulations and industry activity. A copy of the Commission's Mandatory Minimum Standards and other attendant regulations are available in each video interpreter cubical as a reference. This not only ensures that video interpreters are familiar with Commission requirements but underscores the Company's stringent compliance commitment.

The Company has established a regulatory framework to assess Company compliance with the entirety of applicable Commission rules to identify areas of improvement.

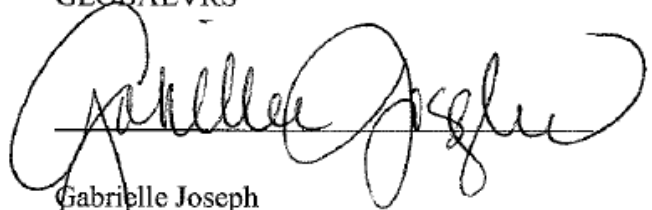
GlobalVRS continues to update its technical practices to prevent waste, fraud, and abuse. The Company's platform automatically screens out any non-U.S. Internet Protocol addresses or unregistered TDN. In 2013, the Company implemented a platform function that requires video interpreters to affirmatively authenticate the validity of each call at the end of the call and identify the call as BILLABLE or NON-BILLABLE. This affirmative authentication provides another layer of fundamental decision making and empowerment to the Company's video interpreters to report any call they feel would be non-compensable or breaking any form of FCC regulation.

V. CONCLUSION

As demonstrated herein, ASL continues to meet the MMS and additional requirements for the provision of Fund-eligible VRS.

ASL SERVICES HOLDINGS, LLC DBA
GLOBALVRS

By:

A handwritten signature in black ink, appearing to read 'Gabrielle Joseph', is written over a horizontal line.

Gabrielle Joseph
Vice President and Officer
38700 Commerce Boulevard, Suite 216
Kissimmee, FL 34741
Telephone: 407.518.7900 ext. 201

STATE OF FLORIDA)
) ss.
COUNTY OF OSCEOLA)

I, Gabrielle Joseph, swear under penalty of perjury that I am a Vice President and an Officer of ASL Services Holdings, LLC dba GlobalVRS, the reporting entity, and that I have personally examined the foregoing submission, and that all information required under the Commission's rules and orders have been provided and that all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

By:

Subscribed and Sworn to me this 1st day of November 2017.

Notary Public

My Commission expires OCTOBER 10, 2020

SEAL



Kathleen A. Dickson
NOTARY PUBLIC
STATE OF FLORIDA
Comm# GG029327
Expires 10/10/2020

Annual 47 C.F.R. §64.5105 et seq. CPNI Certification

Annual Customer Proprietary Network Information ("CPNI") Certification covering the period January 1, 2016 through December 31, 2016, pursuant to 47 C.F.R. §64.5109(e).

Date Filed: November 1, 2017

Name of Company covered by this Certification: ASL Services Holdings, LLC dba Global VRS

Name of Signatory: Gabrielle Joseph

Title of Signatory: Chief Executive Officer

Certification: I, Gabrielle Joseph, do hereby certify under penalty of perjury that I am an officer of ASL Services Holdings, LLC dba Global VRS, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules for Internet-based Telecommunications Relay Service Providers, 47 C.F.R. §64.5105 et seq.

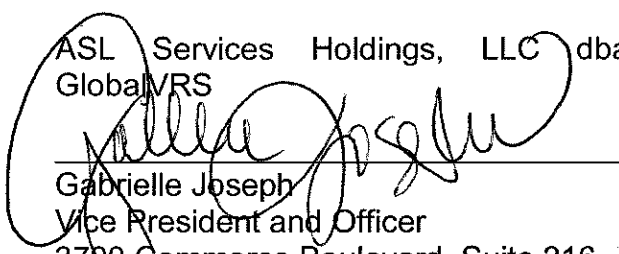
Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.5105 et seq. of the Commission's rules as applicable.

The Company has not taken any actions (*i.e.* proceedings instituted or petitions filed by a company at either state commissions, the court system or the Commission against data brokers) against data brokers in the past year.

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 19 of the U.S. Code and may be subject to enforcement action.

ASL Services Holdings, LLC dba
Global VRS



Gabrielle Joseph
Vice President and Officer
3700 Commerce Boulevard, Suite 216
Kissimmee, Florida
Telephone: 407.518.7900

Attachment 1: Statement Concerning Company Procedures

ASL Services Holdings, LLC dba Global VRS ("Company") has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information ("CPNI") to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees who may have access to CPNI receive an initial CPNI protection briefing and periodic reminders thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic notes and retained for a minimum of three years, as set forth in 47 C.F.R. §64.5109. All sales or marketing campaigns initiated by the Company require approval of the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2016, the Company took no action against data brokers. In calendar year 2016, the Company received no consumer complaints regarding CPNI issues.